IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Chevron Corporation Opposer

and

Opposition Number 91170945 Serial No. 78609348 Mark: Standard Oil Company

Standard Oil Company, Inc. A Florida Corporation

STANDARD OIL COMPANY, INC.'S FIRST SET OF INTERROGATORIES TO CHEVRON

STANDARD OIL COMPANY, INC., propounds the following written Interrogatories to CHEVRON CORPORATION, to be answered under oath, within thirty (30) days in accordance with applicable Rules of Civil Procedure, the answers to include information within the knowledge of the CHEVRON CORPORATION.

Respectively submitted,

J. David Haynes, Esquire 10225 Ulmerton Road Building 7C Largo, FL 33771-3538

727.584.6100 727.544.3733 - fax Attorney for Applicant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served by U.S. Mail, postage pre paid, to Elaine Setton, Chevron Corporation. P.O. Box 6066, San Ramon, CA 94583 on August 31, 2006.

J. David Haynes, Esquire 10225 Ulmerton Road

Building 7C

Largo, FL 33771

Attorney for Applicant



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Chevro	n Corporation	
	Opposer	Opposition Number 91170945
		Serial No. 78609348
and		Mark: Standard Oil Company
Cando	rd Oil Company, Inc	
Standa	rd Oil Company. Inc.	
	A Florida Corporation	/
	CHEVRON CORP	ORATION'S ANSWER TO
	STANDARD OIL COMPANY'S	S FIRST SET OF INTERROGATORIES
	Ι,	_, being sworn, certify that the following information
:	-	_
is true:		
1.	BACKGROUND INFORMATIO	N:
	a. State your full legal name and any	other name by which you have been known.
	b. State your present residence and	telephone numbers.
	c. State your place and date of birth	

2. EDUCATION:

- a. List all business, commercial, and professional licenses that you have obtained.
- b. List all of your education including, but not limited to, vocational or specialized training, including the following:
 - (1) name and address of each educational institution.
 - (2) dates of attendance.
 - (3) degrees or certificates obtained or anticipated dates of same.

3. **EMPLOYMENT:**

- a. For each place of your employment or self-employment during the last 3 years, state the following:
 - (1) name, address, and telephone number of your employer.
 - (2) dates of employment.
 - (3) job title and brief description of job duties.
 - (4) name of your direct supervisor.

- 4. Other than as an employee, if you have been engaged in or associated with any business, commercial, or professional activity within the last 3 years that was not detailed above, state for each such activity the following:
 - (1) name, address, and telephone number of each activity.
 - (2) dates you were connected with such activity.
 - (3) position title and brief description of activities.
 - (4) starting and ending compensation.
 - (5) name of all persons involved in the business, commercial, or professional activity with you.

5. State the name of each person who assisted you in answering these interrogatories by setting forth the information requested above as to each such person.

6. Specifically identify each and every "Standard" station that is owned and operated by Chevron Corporation by stating the exact location and the exact dates such station has been operated.

7. Specifically identify by name, title, address, telephone number and corporate position with Chevron of such individual(s) who manages such Standard stations.

8. Specifically identify each and every item that is sold in such Standard stations in the State of Florida and in each state where Chevron maintains a Standard station, if any, which bears a label having any variation whatsoever of the word"Standard".

9. Specifically state for each and every station identified in answer to interrogatory No. 6, the gross revenue generated individually for each such article.

10. Specifically identify the individual(s) who mandate that Standard stations be maintained in the states identified in answer to Interrogatory 6 by stating his/her or their name, title, address, telephone number and specific designated responsibilities.

11.	Why does Chevron maintain a station(s) in certain states of the United States?
ANSV	WER:

12.	Why does Chevron not have a federal trademark registration for Standard?			
ANSWER:				

13. Identify each and every agreement Chevron has with another entity which relates to the word "Standard".

14. Specifically identify each and every corporation in which Chevron has any interest whatsoever under the name of Standard Oil Company, Inc. or any variation thereof, by stating the name, state and date of incorporation and the individual who made the decision to file such corporation.

15. State with particularity the facts upon which Opposer maintains that Opposer owns valid and long standing common law rights in the trademark STANDARD for petroleum and petroleum products including lubricants, gasoline and automotive service station services.

16. Specifically identify each and every product sold by Opposer which has on said product the word STANDARD and Opposer's name and identify the geographic area of any such sale.

17. Specifically identify with particularity each and every product which Opposer markets and sells that are competitive with or closely related to the goods described in defendant's application for registration which is the subject matter of this opposition.

18. Specifically state the reason(s) that Opposer does not have a federal registration for the trademark which is opposed herein.

19. Specifically state each and every entity who does use the trademark STANDARD OIL COMPANY.

Specifically state each and every entity, if any, who has used the trademark STANDARDOIL COMPANY with the consent of Opposer.

21.	With regard to paragraph 3 of Opposer's statement: "Opposer has expended over the			
	years substantial amounts of money and resources in advertising and promoting its			
	STANDARD trademark.", specifically state:			
	•	the amount of money expended by year and amount		
	a.	the amount of money expended by year and amount		
ANSV	WER:			
	b.	the resources in advertising by date and location and		
4 - 101		the resources in advertising by date and location and		
ANS	WER:			

C.	the money expended in promoting by year and location of		
the alleged STANDARD trademark.			
ANSWER:			

I understand that I am swearing or affirming under oath to the truthfulness of the answers to these interrogatories and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Dated:			
	Signature of Party		
	Printed Name:		
STATE OF			
COUNTY OF			
Sworn to or affirmed and signed before me on _	by		
	NOTABY DIDLIC CTATE OF		
	NOTARY PUBLIC—STATE OF [Print, type, or stamp commissioned name of notary.]		
Personally known			
Produced identification			
Type of identification produced			
CERTIFIC	CATE OF SERVICE		
I certify that a copy of this document was mailed to the person listed below on {date}, 2006 to:			
Other party's attorney: J. David Haynes, Esq. 10225 Ulmerton Road, Bldg. 7C Largo, FL 33771			
Chevro	on Corporation		
	•		
Addres	Printed name		